

REMARKS

Claims 1 and 3-14 were pending in the application. Claims 1 and 3-14 were rejected. Claims 1 and 14 have been amended. Claim 13 has been canceled. Applicant respectfully requests reconsideration.

CLAIM OBJECTIONS

The Office Action objected to claims 1, 13, and 14 because of informalities. Those informalities have been corrected.

CLAIM REJECTIONS UNDER 35 USC §101

The Office Action rejected claim 13 under 35 USC §101 as being directed to non-statutory subject matter. As pointed out before, Claim 13 is directed to the statutory class of machines. The Office Action cites PTO policy on method claims, not on machine claims. The Federal Circuit has held that a machine claim was directed to patentable subject matter even where the counterpart method was not. *In re Warmerdam*, 33 F.3d 1354, 1360 (Fed. Cir., 1994). More recently, the Federal Circuit has again held that system claims were patent eligible under 35 USC §101 even where their counterpart method claims were not. *In re Comiskey*, 499 F.3d 1365 ((Fed. Cir. 2007) (claims 17 and 46 were “system” claims, as in the instant case of claim 13, and were held to recite statutory subject matter). Nevertheless, to advance prosecution, claim 13 has been cancelled, thus mooted this issue.

CLAIM REJECTIONS UNDER 35 USC §112

The Office Action rejected claims 1, and 3-14 under 35 USC 112, first paragraph, as failing to comply with the written description requirement. The claims have been amended to include subject matter clearly in the possession of the inventors at the time of filing the application.

CLAIM REJECTIONS UNDER 35 USC §103

The Office Action rejected claims 1, and 3-14 under 35 USC 103(a) as being unpatentable over Jim Conallen, “Modeling Web Application Architectures with UML,” October, 1999, ACM, Vol. 42, No. 10, pp. 63-70 (hereinafter Conallen), in view of Chung et al., “Modeling Web Applications Using Java and UML Related Technologies,” Proceedings of the 36th HICSS’03, IEEE 2002 pp. 1-10 (hereinafter Chung), and further in view of Kuznetzov, USPN: 6, 772,413 (hereinafter Kuznetzov).

As stated previously, Conallen and Chung discuss modeling a Web App using UML or another formal modeling language. Neither Conallen nor Chung, separately or in combination, teach or suggest the method for directly converting Java-based objects to JavaScript-based objects *without* having to generate an intermediary representation such as XML. Further, neither Conallen nor Chung teach or suggest a method as in Claim 1 where the conversion allows the developer to mirror the object hierarchies and maintain the rules, such as typing, that are

found in Java, but not in JavaScript.

The Office Action at page 10 acknowledges that Conallen in view of Chung do not teach or suggest all of the claimed elements of claim 1. The Office Action submits that Kuznetsov provides the deficiencies lacking in both Conallen and Chung. Applicant respectfully traverses this finding. Claim 1, as amended, is not unpatentable over any combination of the cited references.

Kuznetsov's use of XSLT stylesheets does not supply the teachings that both Conallen and Chung lack. Kuznetsov does not provide for the conversion of Java-based objects to JavaScript wherein the Java-based modeling constraints are enforced, even though they are not found in JavaScript. Further, Kuznetsov does not provide a teaching for producing a string that is portable across any environment such that duplicate JavaScript objects are aliased out so that only one appears in the browser.

To clarify these differences, Applicant has amended claim 1. Support for the amendment can be found throughout the disclosure, and more particularly in paragraphs [0016], [0017], [0021], [0041], and [0063] as published in USP 2005/0188353.

Claims 3 through 12 are directly or indirectly dependent on claim 1 and are patentable over Conallen, Chung, and Kuznetsov for at least the same reasons that claim 1 is patentable.

Claim 13 has been canceled, thus mooted its rejection.

Claim 14 is a computer medium counterpart of claim 1. Applicant's arguments with respect to claim 1 apply to claim 14.

For the foregoing reasons, Applicant respectfully requests allowance of the pending claims.

Respectfully submitted,

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